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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 AUGUSTINE CALLEROS, JR.,

CASE NO.: 2:23-cv-01340-GMN-DJA

12 Plaintiff,

**STIPULATION TO EXTEND DEADLINE  
TO RESPOND TO DEFENDANT'S  
MOTION FOR SUMMARY JUDGMENT  
[ECF No. 44]**

13 vs.  
14 CITY OF NORTH LAS VEGAS, a municipal  
corporation,

(Third Request)

15 Defendant.

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17 Plaintiff, Augustine Calleros, Jr. (“Calleros”), by and through his counsel, Melanie Hill Law,  
 18 and Defendant City of North Las Vegas (“CNLV”), by and through its counsel, Madison Zornes-Vela,  
 19 hereby stipulate to extend the deadline for Mr. Calleros to respond to Defendant’s Motion for Summary  
 20 Judgment filed on August 28, 2024 [ECF No. 44] from the current deadline of November 18, 2024 for  
 21 three additional days up to and including November 21, 2024. This Stipulation is made at the request  
 22 of Plaintiff’s counsel for the reasons set forth herein. This is the third request to extend the deadline to  
 23 respond to this dispositive motion.

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25 In support of this Stipulation and Order, the parties state as follows:

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27 1. The current deadline to respond to the Defendant’s Motion for Summary Judgment  
 28 filed on August 28, 2024 [ECF No. 44] is November 18, 2024. The parties have agreed to a third

extension of the deadline three additional days from the current deadline of November 18, 2024 until November 21, 2024.

2. Counsel for Plaintiff reached out to counsel for Defendant requesting an additional three-day extension of the response deadline due to Plaintiff's counsel's daughter's illness last week that kept her out of school and continued over the weekend and Plaintiff's counsel's illness that started this morning. Counsel for Defendant has agreed to the requested three-day extension.

3. This stipulation to extend the dispositive motion deadlines is brought in good faith, with a showing of good cause, and is not sought for any improper purpose or other purpose of delay, but to allow counsel for the Plaintiff the additional time requested to respond to the dispositive motion considering the issues she has described herein constituting good cause for the short extension.

WHEREFORE, the parties respectfully request by this stipulation that the Court extend the deadlines for Mr. Calleros to respond to the City of North Las Vegas's Motion for Summary Judgment filed on August 28, 2024 [ECF No. 44] from the current deadlines of October 18, 2024 to November 18, 2024.

DATED this 18th day of November, 2024.

Respectfully submitted,

MELANIE HILL LAW PLLC

/s/ Melanie Hill

Melanie A. Hill, Esq. (NV Bar No. 8796)  
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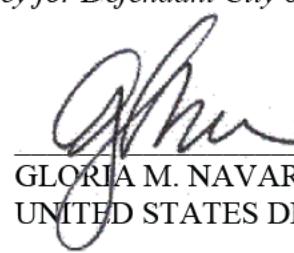
Respectfully submitted,

NORTH LAS VEGAS CITY ATTORNEY

/s/ Madison Zornes-Vela

Madison Zornes-Vela, Esq. (NV Bar No. 13626)  
2250 Las Vegas Blvd., N., Suite 810  
North Las Vegas, Nevada 89030  
Tel: (702) 633-1057  
*Attorney for Defendant City of North Las Vegas*

IT IS SO ORDERED:

  
GLORIA M. NAVARRO  
UNITED STATES DISTRICT JUDGE

Dated: November 19, 2024